

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD KUHN,

Defendant.

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Cause No. 4:16CR00303CEJ/NCC

**DEFENDANT'S REQUEST FOR EXTENSION OF TIME TO FILE
PRE-TRIAL MOTIONS**

Comes now counsel for the defendant and respectfully requests a thirty-day extension of the filing deadline for pre-trial motions or to waive filing of motions.

1. The Defendant has been charged by indictment with Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

2. The Defense needs more time to complete investigation and research to determine whether to file pretrial motions.

3. After completion of investigation and research, Defense Counsel will be able to determine if filing motions is necessary in this case.

4. The discovery in this case is somewhat voluminous and Defense Counsel needs more time to review the disclosure with the Defendant.

5. Further, Defense Counsel would like the additional time to engage in settlement discussions which may make the need for pretrial motions moot.

6. Defense Counsel has discussed this request for additional time with Assistant United States Attorney Stephen Casey who does not oppose this request.

7. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure the Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(8).

WHEREFORE, for the foregoing reasons the Defendant requests an extension of thirty days to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By: /s/ Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Stephen Casey
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel